

**Westchester**  
1311 Mamaroneck Avenue, Suite 170  
White Plains, New York 10605

**Via ECF**

Hon. Philip M. Halpern, U.S.D.J.  
United States Courthouse  
300 Quarropas St., Ctr. 520  
White Plains, NY 10601

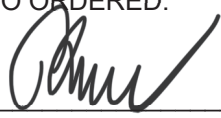
ATTORNEY  
Teleph  
Facsim

Application granted.

The parties shall file the paperwork required by *Cheeks* and its progeny on or before September 20, 2022.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 92.

SO ORDERED.

  
Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
September 12, 2022

Re: *Norlan Gonzalez, et al. v. Fresh Start Painting Corp., et al.*  
Case No. 18-cv-11124-PMH

**SECOND JOINT Request to Extend Date for *Cheeks* Submission**

Dear Judge Halpern:

This office is Counsel to Defendants. Per the recent Order, the Parties are to file the *Cheeks* submission by September 13, 2022. With the additional week previously provided by Your Honor, the Parties have successfully negotiated an agreeable payment plan which now includes the amounts determined in the August 26, 2022 Order (ECF 89) concerning the amount of attorneys' fees and costs. Counsel for Plaintiffs is in the process of revising the anticipated submission which will now include the entirety of resolution of this case, including providing for payment of the fees and costs portion thereof.

In light of same, the Parties are respectfully requesting an additional one-week extension of the deadline to submit a *Cheeks* submission. The request is made to permit sufficient time for Counsel to finalize the submission and allow for review and approval by the respective Parties.

The Court previously granted a short one-week extension. The Parties request a short second extension of this deadline to Tuesday, September 20, 2022. Counsel for Plaintiffs have reviewed and consent to this application. Thank you for your attention and consideration of this request.

Respectfully submitted,

**TRIVELLA & FORTE, LLP**

By: s/ Arthur J. Muller III

Arthur J. Muller III

*Attorneys for Defendants*

1311 Mamaroneck Avenue, Suite 170  
White Plains, NY 10605  
(914) 949-9075

cc: Plaintiffs' Counsel (via ECF)